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December 8, 2006

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## **VIA TELEFAX (205) 678-0000**

Kate Hortberg Boardman, Carr, Weed & Hutcheson, P.C. 400 Boardman Drive Chelsea, Alabama 35043-8211

RE: A.G., et al. v. Autauga County Board of Education

Dear Kate:

I know that Rick and you have discussed some outstanding discovery in this case, which we have requested.

In accordance with the discussions that Rick and you had last week, we would propose the following:

- 1. With respect to Request for Production No. 5, in which we requested the computer and/or hard drive for Larry Butler, Dene Cleveland, Angel Garrett and Janie McAlpine (Janie Crawford), we would ask that you produce the index of files and each of their computers or the index from the central filing system for the time period of October 1, 2004 through the current date. We believe this is a reasonable request and has narrowed the scope of the request too.
- 2. With respect to our Request for Production No. 7, which asks for the index and files from Mrs. Goodson's computer or the central files system for October 1, 2004 through the present date. We believe this is a reasonable request and this information can be easily obtained by one of the county board of education's computer technology persons.

Please let us know on these two matters as soon as possible. Otherwise, we will file the appropriate motion with the Court.



Kate Hortberg Letter December 8, 2006 Page 2 of 2

My best regards,

BEASLEY, ALLEN, CROW, METHVIN, PORTIS & MILES, P.C.

MICHAEL J. CROW

MJC/anc

CC: Rick Drummond VIA TELEFAX (251) 650-1264